

AO 91 (Rev. 02/09) Criminal Complaint

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UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

United States of America

v.

Samuel Allan Flek

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)
)

Case No.

2:14-mj-417

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 08/13/2014 in the county of Franklin in the Southern District of Ohio, the defendant violated 21 U. S. C. § 846, an offense described as follows:

Conspiracy to Distribute Marijuana

This criminal complaint is based on these facts:

See attached

☒ Continued on the attached sheet.



Complainant's signature

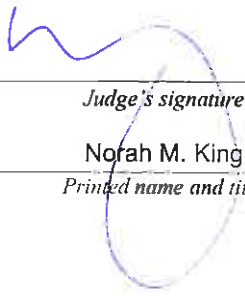
James E. Raterman, Special Agent ICE

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/25/2014

City and state: Columbus, Ohio



Judge's signature

Norah M. King

Printed name and title

MH

SOUTHERN DISTRICT OF OHIO

COLUMBUS, OHIO

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, JAMES E. RATERMAN, being duly sworn, depose and say:

1. I am employed as a Special Agent (SA) for Homeland Security Investigations – Immigration and Customs Enforcement (ICE), and have been so employed for more than 20 years. I am presently assigned to a Bulk Cash Task Force in Columbus, Ohio.

2. This Affidavit is in support of an Application for a complaint for SAMUEL ALLAN FLEK.

3. The information contained herein is based on my personal knowledge, information provided to me by other Task Force Officers of ICE, other law enforcement officers, cooperating witnesses, and other sources as indicated herein.

Investigation

1. On August 6, 2014 the HSI Bulk Cash Currency Task Force was conducting surveillance of the Red Roof Inn located at 5001 Renner Road, Columbus, Ohio 43228.
2. Investigators had identified a rental car that had been leased by a Samuel Allan Flek of Granite Bay, California. Red Roof Inn had also advised that Flek was a frequent guest at the motel.
3. During the course of the surveillance on 08/06/2014, Flek exchanged rental vehicles at Port Columbus Ohio, went to the FEDEX office located on High Street in Columbus, OH and eventually return to the Red Roof Inn.
4. On 08/07/2014 surveillance followed Flek's rental vehicle to the CubeSmart Self Storage, 525 Nike Drive, Hilliard, Ohio. Surveillance was able to determine that Flek had entered unit #160. Investigation established that Flek had rented the unit in November 2013 in the alias name of Raymond Schmit.
5. A State of Ohio search warrant was secured and executed on the storage unit #160. Inside the storage unit investigators found equipment/items used to package and transport narcotics proceeds. Investigators also found \$115,000 in U.S. currency inside the storage unit.

6. On 08/12/2014 investigators discovered that Flek was back in Columbus, Ohio and had traveled to the Dayton Ohio area. On 08/13/2014 Flek returned to the Columbus area and was interdicted by investigators. Flek was in possession of approximately \$225,000. On 08/14/2014, Flek was mirandized and made the following admissions:
- Flek had been making at least monthly trips to Columbus Ohio, since April 2012, for the purposes of transporting narcotics proceeds back to California on behalf of other individuals involved in the trafficking of narcotics.
 - Beginning in January-February 2013, Flek, in addition to transporting currency, began transporting marijuana in large duffel bags from source(s) of supply in Columbus, Ohio to a co-conspirator in Dayton, Ohio on a monthly basis.
7. The investigation has documented that Flek has transported in excess of \$1,000,000 in cash for the narcotics trafficking group since April 2012.

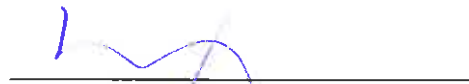
CONCLUSION

Based on the facts and circumstances stated above, I assert that there is probable cause to believe that: SAMUEL ALLAN FLEK conspired with others to possess with the intent to distribute marijuana in the Southern District of Ohio.



James E. Raterman
Special Agent
Immigration and Customs Enforcement

Subscribed and sworn to before me this 25th day of August, 2014.



United States Magistrate Judge
Columbus, Ohio

N. M. - KNY